

# EXHIBIT 25

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARBUTUS BIOPHARMA CORPORATION	)	
and GENEVANT SCIENCES GmbH,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 22-252 (MSG)
	)	
MODERNA, INC. and MODERNATX, INC.	)	<b>HIGHLY CONFIDENTIAL –</b>
	)	<b>OUTSIDE COUNSEL’S EYES ONLY</b>
Defendants.	)	
<hr/> MODERNA, INC. and MODERNATX, INC.,	)	
	)	
Counterclaim-Plaintiffs,	)	
	)	
v.	)	
	)	
ARBUTUS BIOPHARMA CORPORATION	)	
and GENEVANT SCIENCES GmbH,	)	
	)	
Counterclaim-Defendants.	)	

**DEFENDANTS’ RESPONSES AND OBJECTIONS TO PLAINTIFFS’ FOURTH SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS (NOS. 174–175)**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendants Moderna, Inc. and ModernaTX, Inc. (collectively, “Moderna” or “Defendants”) provide their responses and objections to Plaintiffs Arbutus Biopharma Corporation (“Arbutus”) and Genevant Sciences GmbH (“Genevant”)’s requests for production (Nos. 174–175).

**GENERAL OBJECTIONS**

Moderna incorporates by reference its General Objections provided in Moderna’s Responses and Objections to Plaintiffs’ First Set of Requests for Production to Defendants (Nos. 1–98) served February 2, 2023.

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Moderna also objects the sheer number of requests, now totaling 175, as unreasonable burdensome, duplicative, and not proportional to the needs of the case, particularly where Plaintiffs expect Moderna to carry out an unreasonable number of searches at this stage in the case.

**DEFINITIONS**

Moderna incorporates by reference the Definitions provided in Moderna’s Responses and Objections to Plaintiffs’ First Set of Requests for Production to Defendants (Nos. 1–98) served February 2, 2023.

**OBJECTIONS TO REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 174**

[REDACTED]

**RESPONSE TO REQUEST FOR PRODUCTION NO. 174:**

Moderna objects to this Request as overbroad, unduly burdensome, and calling for information not relevant to any of the claims or defenses in this litigation and/or not proportional to the needs of this case, including because it seeks [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], which presumes all such samples and documents are relevant. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Moderna

will not produce documents or materials relating to batches of the Accused Products (and materials

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used in those batches) that were not made, used, offered for sale, or sold within the United States or imported into the United States, which are not accused of infringement. [REDACTED]

[REDACTED]  
[REDACTED] Moderna objects to this Request as vague and ambiguous, at least with respect to the phrase “histories,” which is not defined. Moderna objects to this Request to the extent it seeks documents and materials not within Moderna’s custody, possession, or control. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
Subject to and without waiving any of its general or specific objections, Moderna will not produce documents and materials responsive to this Request.

**REQUEST FOR PRODUCTION NO. 175**

All documents related to United States Government Accountability Office Report No. 21-319, Operation Warp Speed, Accelerated COVID-19 Vaccine Development Status and Efforts to Address Manufacturing Challenges, including but not limited to, Moderna’s “questionnaire responses and vaccine development documents” and any documents related to Moderna’s “testimonial evidence.” See <https://www.gao.gov/assets/720/712410.pdf>, at 24.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 175:**

Moderna objects to this Request as overbroad, unduly burdensome, and calling for information not relevant to any of the claims or defenses in this litigation and/or not proportional to the needs of this case, including because it seeks “[a]ll documents related to United States Government Accountability Office Report No. 21-319, Operation Warp Speed, Accelerated COVID-19 Vaccine Development Status and Efforts to Address Manufacturing Challenges,” which presumes that all such documents are relevant. Moderna will not produce documents concerning this action that do not relate to the issues in dispute and/or the claims and defenses of

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